

REMARKS/ARGUMENTS

The Applicants appreciate the Examiner's continued consideration of the present Application. In the Office Action dated July 28, 2004, claims 1 and 19-21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kirilloff (U.S. Patent No. 3,895,264) in view of Lycan (U.S. Patent No. 4,737,603). The Applicants appreciate the indication in the Office action that claims 2-18 and 22 are allowable.

In response to the rejection of claims 1 and 19-21, the Applicants have amended independent claims 1, 19 and 21. In particular, claim 19 has been amended to provide that the determining of when device isolation has been selected occurs "by way of an actuatable switch located at a first location" and that the short-circuiting of the supply lines to ground occurs "at a second location remote from the first location". These amendments do not add new matter and, rather, are supported by the Specification at FIG. 5, for example.

Additionally, claim 21 has been amended to recite additionally the providing of at least one control signal when it is determined that device isolation has been selected, and further that the grounding of the supply lines at least indirectly occurs in response to the at least one control signal. These amendments also do not add new matter and, rather, are supported by the Specification at FIG. 2 and the text relating thereto, for example.

Finally, claim 1 has been amended to eliminate certain unnecessary language from the preamble of that claim.

In view of these amendments, the Applicants respectfully submit that the rejections of these claims are overcome, for at least the following reasons:

Allowability of Claim 1 Over Kirilloff and Lycan

Despite the comments in paragraph 3 of the Office action, the Applicants submit that claim 1 is allowable under 35 U.S.C. 103(a) over Kirilloff and Lycan, alone and in combination. In particular, the Applicants respectfully submit that it would not have been obvious to one of ordinary skill in the art to combine the teachings of Lycan with those of Kirilloff to arrive at the Applicants' claim 1 invention because Lycan and Kirilloff deal with two mutually incompatible systems. As discussed in the Applicants' previous Amendment, Kirilloff entirely fails to disclose or suggest the use or control of a device that connects the input nodes or supply lines of a powered device to ground. While Kirilloff employs a control circuit, this control circuit has an entirely different purpose than one which would connect the

input nodes/supply lines of a powered device to ground. Indeed, as stated in the Applicants' previous Amendment, "Kirilloff concerns verifying that a grounding connection is maintained while a device is receiving power" but does not at all concern "verifying that the device is isolated and grounded when it is not supposed to be receiving power". Since Lycan expressly concerns an isolation switch, Kirilloff is entirely incompatible with Lycan, and does not contain any suggestion to combine or modify the teachings of either reference so as to arrive at the Applicants' claim 1 invention.

Further, although Lycan shows a device that is capable of both delinking power from a device and short-circuiting the device to ground, this type of system bears no relation to that of Kirilloff. First, Lycan appears to be a manually driven isolation switch. Further, even if the switch disclosed in Lycan was controlled by some other control circuitry, there is no suggestion or motivation provided in Lycan as to whether it would be possible or desirable to combine the particular switch of Lycan with a controller such as that disclosed in Kirilloff. Indeed, for the reasons discussed above, the circuitry of Kirilloff appears to be incompatible with and irrelevant to the control of an isolation switch such as that of Lycan. Thus, Lycan also lacks any suggestion to combine or modify the teachings of either reference so as to arrive at the Applicants' claim 1 invention.

For at least these reasons, therefore, the Applicants submit that claim 1 is allowable under 35 U.S.C. 103(a) over Kirilloff and Lycan, alone and in combination.

Allowability of Claim 19 Over Kirilloff and Lycan

The Applicants further submit that amended claim 19 is allowable under 35 U.S.C. 103(a) over Kirilloff and Lycan, alone and in combination, for at least two reasons. First, the Applicants submit that the above argument concerning the inappropriateness of combining Kirilloff and Lycan pertains equally to claim 19.

Second, the Applicants submit that Kirilloff and Lycan alone and in combination fail to show a system that determines when device isolation has been selected by way of an actuatable switch located at a first location and then short-circuits the supply lines to ground at a second location remote from the first location. That is, Kirilloff and Lycan fail to show a system in which the grounding occurs remotely from the location at which a grounding command is received by way of a switch.

In particular, while Lycan shows an isolation switch that is capable of grounding supply lines, the Applicants do not find any clear teaching of how the isolation switch could

be actuated by a remote switch. In particular, it is not at all clear how the switch 260 could be controlled by way of a remote switch. Lycan, rather than being remotely controlled, appears instead to be a manually-operated device. As for Kirilloff, the Applicants are unable to find any disclosure or suggestion within that reference as to how a grounding configuration could be remotely controlled. Rather, as best as the Applicants can determine, Kirilloff only shows controlling a three-phase circuit 4 by way of a control circuit that is local with respect to that three-phase circuit (see, e.g., FIG. 1). That is, Kirilloff shows local control rather than remote control. Thus, the Applicants submit that Kirilloff and Lycan each fail to disclose, or suggest, remote control of a grounding configuration.

For at least these reasons, therefore, the Applicants submit that claim 19 is allowable under 35 U.S.C. 103(a) in view of Kirilloff and Lycan, alone or in combination.

Allowability of Claim 21 Over Kirilloff and Lycan

The Applicants further submit that amended claim 21 is allowable under 35 U.S.C. 103(a) over Kirilloff and Lycan, alone and in combination, for at least two reasons. First, the Applicants submit that the above argument concerning the inappropriateness of combining Kirilloff and Lycan pertains equally to claim 21.

Second, the Applicants submit that Kirilloff and Lycan alone and in combination fail to show or suggest providing at least one control signal when it is determined that device isolation has been selected, and grounding the supply lines at least indirectly in response to the at least one control signal. More particularly, although Lycan shows an isolation switch, that switch appears to be manually operated and it is not apparent from Lycan how such switch might be operated in response to any control signal. As for Kirilloff, that reference entirely fails to disclose or suggest the grounding of supply lines in response to any control signal. Rather than grounding any supply lines in response to any control signal, Kirilloff rather merely shows the disconnection of power from supply lines.

For at least these reasons, therefore, the Applicants submit that claim 19 is allowable under 35 U.S.C. 103(a) in view of Kirilloff and Lycan, alone or in combination.

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Conclusion

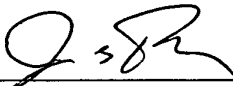
Given the Applicants' Remarks and Amendments, the Applicants respectfully request reconsideration and allowance of the present Application.

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The Applicants wish to invite the Examiner to telephone the Applicants' attorney at the number listed below if discussion with the Applicants' attorney would be of assistance to the Examiner or further the prosecution of the present Application.

No additional fees for filing this paper are believed to be due. However, the Commissioner is hereby authorized to charge an additional fee due or to credit any overpayment to deposit account no. 17-0055.

Respectfully submitted,
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